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September 4, 2018

**VIA ECF**

Magistrate Judge Steven L. Tiscione  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, New York 11201

**Re: Janine Linton v. Frontier Airlines, Inc.**  
**Index No.: 18 CV 00044**  
**CF File: 16489/122476**

Dear Judge Tiscione:

We represent the Defendant in the referenced action and write on behalf of both parties to provide Your Honor with an updated status report.

On August 27<sup>th</sup>, Plaintiff served the discovery responses and she provided a Verification for her interrogatory responses. Defendant served its responses to Plaintiff's discovery demands on August 21<sup>st</sup>.

Since Plaintiff's discovery responses were just recently served, Defendants have only now first received authorizations for several medical providers, Plaintiff's health insurance, and one of Plaintiff's employers. Additionally, Plaintiff has not yet provided authorizations for her other employer(s) and for her tax returns, which will be relevant due to the lost wages that are claimed. We have also requested that Plaintiff provide a supplemental response to Defendants Request for the Production of Documents, as many of the demands set forth were not responded to.

Despite the additional document discovery, the parties have agreed to proceed forward with depositions. Plaintiff's deposition is scheduled for September 26<sup>th</sup>. The deposition of Defendant's witness will take place during the week of October 1<sup>st</sup>. The date/time for Defendant's witness has not yet been confirmed as the witness will be flying into New York from out of state and we are coordinating with the witness and counsel to make arrangements.

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In light of the fact discovery remaining and the anticipated additional discovery that may flow from the party depositions, the parties request that the fact discovery deadline be extended until the deadline for all discovery, which is December 27, 2018. The current deadline for fact discovery is October 19<sup>th</sup>. The parties have not previously requested an extension of the fact discovery deadline.

Your Honor's attention to this matter is greatly appreciated.

Respectfully,



Michael Bojbasa

MB/dzc

cc: VIA ECF  
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